

Atty. Dkt. No. 035451-0146 (3683.Palm)

**REMARKS**

Applicant respectfully requests reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow.

A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier.

Claims 1-40 are presently pending in this application.

**Claim Rejections – 35 U.S.C. § 102**

In Section 2 of the Office Action, the Examiner rejected claims 1-9, 12-15, 17-19, 22-31, 34-37, 39 and 40 under 35 U.S.C. § 102(a) as being anticipated by Ogura et al. (U.S. Patent No. 6,189,056). The Examiner indicates that with regard to independent claim 1, the claim limitation that “the display is smaller than a display of the handheld computer does not differentiate the claim combination from the disclosure of Ogura et al. Applicants respectfully disagree. The recitation of “a handheld computer” should be construed more narrowly than construed by the Examiner. Terms of the claim should be given their plain meaning. Here, Applicants are concerned with the construction of the words “handheld computer” by the Examiner. The Examiner has construed a laptop computer, which is disclosed in the Ogura et al. reference as a handheld computer. Applicants, however, disagree. In response, Applicants submit as Exhibit A (attached hereto) a printout from the website Dictionary.com which indicates that a “handheld computer” is “a computer small enough to be carried in your pocket.” A laptop computer is not one which can conventionally be carried in your pocket. Applicants also submit as Exhibit B (attached) an alternative definition of the term “handheld” as it refers to computers. Exhibit B comes from the website SearchMobileComputing.com. The site describes a handheld computer as “a computer than can conveniently be stored in a pocket (of sufficient size) and used while you are holding it.” Thus, it is clear that the plain meaning of “handheld computer” should not be construed to include notebook computers, as the Examiner has suggested. Further still, it

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should be appreciated that the Applicant may be his or her own lexicographer as long as the meaning assigned to the term is not repugnant to the term's well known usage. In re Hill, 161 F.2d 367, 73 USPQ 482 (CCPA 1947). Accordingly, Applicants refer the Examiner to the specification at p. 1, ¶ [0002], which states "handheld computing devices, palmtops, personal digital assistants (PDAs) or handheld computers typically weigh less than a pound and fit in a pocket." Accordingly, it is clear that the Applicants have defined the term "handheld computer" within specified constraints which would not include notebook computers. Notebook computers conventionally do not weigh less than a pound and conventionally do not fit in a pocket.

For the reasons given above, it can be seen that the Applicants' limitation that "the display is smaller than a display of the handheld computer," is not disclosed, taught or suggested by Ogura et al. Applicants show that this is a very important limitation in the application, as the electronic module can be used in a variety of very small devices such as, but not limited to, a mobile phone (FIG. 5) or a watch (FIG. 4).

Accordingly, for the all the reasons given above, Applicants respectfully submit that independent claim 1 and its respective dependent claims are not anticipated by Ogura et al., nor should they be found obvious in view of Ogura et al. alone and/or in combination with Kotchick et al. (U.S. Published Application No. 2003/0016327).

With regard to independent claim 19, Applicants respectfully submit that what is claimed is "an accessory module for a handheld electronic device." The accessory module includes an interface housing that can unfold to extend for insertion into an interface slot in "the handheld electronic device" and further that the "interface can be used to couple to a host device when in the folded position." Applicants respectfully submit that first, Ogura et al. does not disclose, teach, or suggest a "handheld electronic device" and further a handheld electronic device having a slot into which the interface housing can extend into. Again, because Ogura et al. does not disclose a handheld electronic device which receives the accessory module, in light of the reasonable construction of the word "handheld" as referred to with regard to claim 1, Ogura et al.

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does not disclose, teach or suggest a handheld electronic device having a slot that receives an accessory module. Secondly, Ogura et al. does not disclose, teach or suggest another device (the host device) into which the accessory module may be received in the folded position. Applicants have shown that their device can get information from a handheld computer be folded, and snapped into a watch band, for example.

Accordingly, because Ogura et al. does not disclose, teach or suggest, an accessory module for a handheld electronic device that meets all of the claim limitations of claim 19, claim 19 and its respective dependent claims are not anticipated by Ogura et al. and are therefore allowable.

Independent claim 23 is directed to "a portable electronic module for coupling to a host handheld device." The portable electronic module includes "an interface configured to be removably coupled to the host handheld device." Accordingly, for the reasons given above, Ogura et al. does not disclose a portable electronic module that couples to a host handheld device. Using the ordinary meaning of "handheld device," (as discussed above) Ogura et al. discloses only a handheld device that can be interfaced with a notebook, desktop, or tower computer. Ogura et al. does not disclose, teach or suggest the use of a portable display module that couples to a host handheld device. Thus, independent claim 23 and its respective dependent claims are not anticipated by Ogura et al. and are therefore allowable.

In Section 7 of the Office Action, the Examiner rejected claims 1, 10, 11, 16, 19, 20, 23, 32, 33, and 38 under 35 U.S.C. § 102(e) as being anticipated by Kotchick et al. Referring now to independent claim 1, Kotchick et al. does not disclose, teach or suggest that the electronic module is a standalone electronic module, but rather it is just a removable display. In fact, the Examiner points to ¶ [0033] and ¶ [0037] of Kotchick et al. What is described at ¶ [0037] is simply a removable display module that "need only be electronically connected in a suitable manner to a power source and any necessary electronics not already included in the module." Accordingly, Kotchick et al. teaches away from an electronic module having its own processor,

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memory, and power supply coupled to the processor as recited in independent claim 1. Thus, independent claim 1 is not anticipated by Kotchick et al. and independent claim 1 and its respective dependent claims are therefore allowable.

With regard to independent claim 19, the Examiner indicates that the tiltability of the connector in slot 820 which is part of the host device, is the same as the foldability of the interface housing which is a portion of the accessory module recited in independent claim 19. The reasons for including a foldable interface housing are completely different from the tiltable connector that is coupled to the host electronic device of Kotchick et al. Applicants utilized a foldable interface so that the accessory module can be adapted to a plurality of different types of devices or could act as a compact standalone device in which the interface is folded out of the way. The reason for the inclusion of a tiltable interface in the host electronic device of Kotchick et al., is simply to enable the fitting of the display module into the host device. Accordingly, Kotchick et al. does not disclose, teach or suggest the foldable interface housing on the accessory module such as that recited in independent claim 19. Accordingly, independent claim 19 and its respective dependent claims are therefore allowable.

With regard to independent claim 23, Applicants respectfully submit that the portable electronic module recited in independent claim 23 that includes a power supply coupled to the processor is not disclosed, taught or suggested by Kotchick et al. As explained earlier, Kotchick et al. tends to teach away from a display module having a power source in that the display module 800 is fully functional for displaying images once suitably electronically connected to a power source in the requisite electronics. Therefore, what is described in Kotchick et al. is a display that needs to be coupled to a power source in the host device for it to work. Thus, claim 23 is not anticipated by Kotchick et al. and claim 23 and its respective dependent claims are therefore allowable.

Applicants believe that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

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The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 06-1447. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 06-1447. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 06-1447.

Respectfully submitted,

Date February 17, 2004By Alistair K. Chan

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Attorney for Applicant  
Registration No. 44,603

Dictionary.com

handheld computer

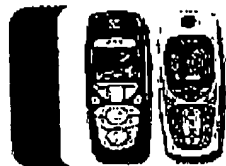
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Exhibit A

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**handheld computer**

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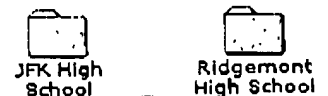
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## handheld

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A handheld computer is a computer that can conveniently be stored in a pocket (of sufficient size) and used while you're holding it. Today's handheld computers, which are also called personal digital assistants (PDAs), can be divided into those that accept handwriting as input and those with small keyboards. The original handheld that accepted handwriting was Apple's Newton,

which was later withdrawn from the market. Today, the most popular handheld that accepts handwritten input is the PalmPilot from 3Com. Philips, Casio, NEC, Compaq, and other companies make handhelds with small keyboards.

Windows CE and EPOC are two of the most widely used operating systems in handheld computers.

Handheld computers are typically used for personal information manager (PIM) types of applications: maintaining schedules, keeping names and phone numbers, doing simple calculations, taking notes, and, with a modem, exchanging e-mail and getting information from the Web. Keyboards have tiny keys that take getting used to. Those that handle handwriting also impose constraints and require some learning. Nevertheless, this class of computer is widely sold and appreciated by many users.

Hewlett-Packard has recently introduced the first handheld computer with a color display. A number of companies now combine voice and data telephone service using cellular telephone or other wireless technologies with the handheld computer in a single device.

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